

ADAM PAUL LAXALT  
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 SHANNON C. RICHARDS  
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*Attorneys for Amber Howell, Steve McBride,  
 Richard Gloeckner, James Goodson, Russell Taylor,  
 Shaun Briley, John Olson and Deborah Knotts*

IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

DANIEL VARGAS, individually )  
 )  
 Plaintiffs, )

vs. )

AMBER HOWELL, Administrator of the )  
 Nevada Division of Child and Family )  
 Services in her individual capacity; STEVE )  
 MCBRIDE, Deputy Administrator of )  
 Nevada Youth Training Center in his )  
 individual capacity; RICHARD )  
 GLOECKNER, Superintendent, Nevada )  
 Youth Training Center in his individual )  
 capacity; ROBERT K. STOKES, Elko )  
 County Manager in his individual capacity; )  
 ELKO COUNTY; JAMES GOODSON, )  
 Head Group Supervisor, in his individual )  
 capacity; RUSSELL TAYLOR, Assistant )  
 Head Group Supervisor, in his individual )  
 capacity; GARY PATTERSON, Group )  
 Supervisor, in his individual capacity; )  
 SHAUN BRILEY, Group Supervisor, )  
 in his individual capacity; JOHN OLSON, )  
 Group Supervisor, in his individual capacity; )  
 DEBORAH KNOTTS, Correctional Nurse, )  
 in her individual capacity; DOE OFFICERS )  
 I-X, DOE HEALTH CARE PROVIDERS )  
 I-X, DOES I-X, inclusive, DOES XI-XX, )  
 Inclusive, ROSE I-X, )

Defendants. )

CASE NO.: 2:14-cv-1942-JCM-CWH

**STIPULATION AND ORDER TO DISMISS  
 EXCESSIVE FORCE CLAIM AGAINST  
 DEFENDANT DEBORAH KNOTTS**

Attorney General's Office  
 555 E. Washington, Suite 3900  
 Las Vegas, NV 89101

**STIPULATION AND ORDER TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED TO by Defendant, DEBORAH KNOTTS by and through her attorneys, ADAM PAUL LAXALT, Attorney General of the State of Nevada, and Shannon C. Richards, Deputy Attorney General and Plaintiff, DANIEL VARGAS, by and through his attorneys, Al Lasso, Paola M. Armeni and Colleen E. McCarty, that Plaintiff's First Cause of Action for Excessive Force in Violation of Plaintiff's Fourth Amendment right in his Amended Complaint (ECF No. 10) filed on February 24, 2015 in the above-captioned matter be dismissed with prejudice against DEBORAH KNOTTS.

This stipulation is based upon the agreement of the parties, with no attorneys' fees or costs to either party.

DATED this 20<sup>th</sup> day of April, 2015.

ADAM PAUL LAXALT  
Attorney General

By:



SHANNON C. RICHARDS  
Deputy Attorney General  
Bar No. 9660  
555 East Washington Ave, Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-3127

DATED this \_\_\_ day of April, 2015.

LASSO INJURY LAW, LLLC

By:

AL LASSO  
Bar No. 8152  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
(702) 625-8777

DATED this 20<sup>th</sup> day of April, 2015.

GORDON SILVER

By:



PAOLA M. ARMENI  
Bar No. 8357  
COLLEEN E. MCCARTY  
3960 Howard Hughes Pkwy., 9<sup>th</sup> Floor  
Las Vegas, Nevada 89169  
(702) 796-5555



**STIPULATION AND ORDER TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED TO by Defendant, DEBORAH KNOTTS by and through her attorneys, ADAM PAUL LAXALT, Attorney General of the State of Nevada, and Shannon C. Richards, Deputy Attorney General and Plaintiff, DANIEL VARGAS, by and through his attorneys, Al Lasso, Paola M. Armeni and Colleen E. McCarty, that Plaintiff's First Cause of Action for Excessive Force in Violation of Plaintiff's Fourth Amendment right in his Amended Complaint (ECF No. 10) filed on February 24, 2015 in the above-captioned matter be dismissed with prejudice against DEBORAH KNOTTS.

This stipulation is based upon the agreement of the parties, with no attorneys' fees or costs to either party.

DATED this \_\_\_\_ day of April, 2015.

ADAM PAUL LAXALT  
Attorney General

By:

SHANNON C. RICHARDS  
Deputy Attorney General  
Bar No. 9660  
555 East Washington Ave, Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-3127

DATED this 29<sup>th</sup> day of April, 2015.

LASSO INJURY LAW, LLC

By:

AL LASSO  
Bar No. 8152  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
(702) 625-8777

DATED this \_\_\_\_ day of April, 2015.

GORDON SILVER

By:

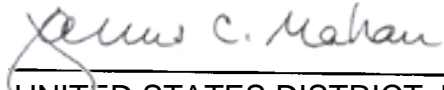
PAOLA M. ARMENI  
Bar No. 8357  
COLLEEN E. MCCARTY  
3960 Howard Hughes Pkwy., 9<sup>th</sup> Floor  
Las Vegas, Nevada 89169  
(702) 796-5555

1 Good cause appearing therefore,

2 IT IS HEREBY ORDERED that the stipulation of the parties is hereby adopted and Plaintiff's  
3 claim for Excessive Force in his Amended Complaint case against Defendant, DEBORAH KNOTTS, is  
4 dismissed with prejudice and without the allowance of attorneys' fees and costs.

5 DATED May 5, 2015.

6  
7 By:

  
UNITED STATES DISTRICT JUDGE